

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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| In Re: TRANS UNION CORPORATION |) | |
| PRIVACY LITIGATION |) | Lead Case No. 00-CV-4729 |
| |) | MDL Docket No. 1350 |
| THIS DOCUMENT RELATES TO: |) | |
| |) | |
| THE PARTIES' STIPULATION |) | Judge Robert W. Gettleman |
| OF SETTLEMENT (DATED |) | Magistrate Judge Michael T. Mason |
| MAY 20, 2008, PACER DOC. #462-2) |) | |

**SETTLEMENT CLASS MEMBER JOHN D. HARKEY, JR.'S
MOTION FOR LEAVE TO APPEAR AND FILE MOTION FOR CLARIFICATION**

Settlement Class Member ("Class Member") John D. Harkey, Jr. ("Harkey") respectfully moves this Court pursuant to Local Rule 5.6 for permission to appear, through counsel, for the limited purpose of filing the attached motion seeking clarification of the Stipulation of Settlement ("Stipulation," Pacer Doc. #462-2) and this Court's Order Granting Final Approval of Settlement and Final Judgment ("Final Approval Order," Pacer Doc. #515) regarding Post-Settlement Claims, as permitted in both the Stipulation and Final Approval Order, and would respectfully show this Court the following –

1. Harkey is a Class Member.
2. To the extent he has not already done so, Harkey desires to "commence" a Post-Settlement Claim pursuant to Section 2.4 of the Stipulation.
3. Harkey hereby seeks clarification from this Court in connection with the proper construction of certain key words and phrases in the Stipulation and Final Approval Order, and in the absence of such clarification Harkey and other Class Members may unwittingly lose certain material benefits intended for them pursuant to the Stipulation.

4. Contemporaneous with the filing of this motion, Harkey's counsel Mikal C. Watts and Ryan L. Thompson have filed motions to be admitted before this Court *pro hac vice*, which motions are currently pending and will be presented with this motion.

5. A copy of Harkey's motion for clarification is attached as Exhibit A.

WHEREFORE, Harkey seeks leave to appear in the above-referenced matter for the sole purpose of filing and presenting to the Court his attached motion for clarification with respect to implementation of the Stipulation and Final Approval Order.

Dated: April 30, 2010

Respectfully submitted,

LOCKE LORD BISSELL & LIDDELL LLP

By: s/ Julie L. Young
Attorneys for John D. Harkey, Jr.

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CERTIFICATE OF SERVICE

Julie L. Young, an attorney, hereby certifies that she caused the foregoing **Motion for Leave to Appear** to be served upon all counsel of record via the CM/ECF System on this 30th day of April, 2010.

s/ Julie L. Young

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